

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ZHOU FANG

Defendant.

UNDER SEAL

Case No. 1:25-MJ-12

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT & ARREST WARRANT**

I, Matthew Lee, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (FBI) since 2017, and I am currently assigned to the Washington Field Office's Child Exploitation and Human Trafficking Task Force. As a Special Agent, I investigate federal violations concerning kidnapping, child pornography, the sexual exploitation of children, human trafficking, and related offenses. I have gained experience through training and work related to conducting these types of investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States, and as a law enforcement officer I am authorized to execute warrants issued under the authority of the United States. Moreover, I am a federal law enforcement officer who is authorized to enforce federal criminal laws, including 18 U.S.C. §§ 2251, 2252, and 2252A.

3. The facts and information in this Affidavit are based upon information that I obtained during this investigation and information that has been provided to me by other law enforcement sources. Since this Affidavit is being submitted for the limited purpose of

establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to support an arrest warrant and criminal complaint.

4. I submit this affidavit in support of a criminal complaint charging ZHOU “JOE” FANG with receipt and attempted receipt of material involving the sexual exploitation of minors, in violation of 18 U.S.C. § 2252(a)(2)/(b)(1). Specifically, while residing in the Eastern District of Virginia, between at least on or about August 14, 2024, and on or about September 17, 2024, FANG knowingly received and attempted to review material involving the sexual exploitation of minors via an internet-based peer to peer program operating on the BitTorrent file sharing system.

BITTORRENT FILE SHARING NETWORK

5. Peer-to-Peer (P2P) file sharing is a method of communication available to Internet users through the use of special software. Computers linked together through the Internet using this software form a network that allows for the sharing of digital files between users on the network. These P2P networks are commonly referred to as decentralized networks because each user of the network is able to distribute information and queries directly through other users of the network, rather than relying on a central server to act as an indexing agent, where all of the information is first deposited before it is distributed. A user first obtains the P2P software, which can be downloaded from the Internet. In general, P2P software allows the user to set up files on a computer to be shared with others running compatible P2P software. However, only files that are specifically stored in shared folders are exchanged. Therefore, a user needs simply to move a file from one folder to another to stop the distribution across the Internet. Further, once a file or files are placed in a shared folder, its distribution is dependent only on the machine being turned

on, the file sharing software being initiated, and the computer being connected to the Internet.

6. BitTorrent is one type of P2P file sharing software. Users of the BitTorrent network wishing to share new content will use a BitTorrent program to create a “torrent” file for the file or group of files they wish to share. A torrent file is a small file that contains information about those file(s) to be shared and provides a method for a user to download the file(s) referenced in the torrent from other BitTorrent users. Torrent files are typically found as the result of keyword searches on Internet sites that host or link to them. Torrent files may be referenced by their “infohash,” which uniquely identifies the torrent based on the file(s) associated with the torrent file. To download file(s) from other users on the BitTorrent network, a user typically obtains a torrent file. The BitTorrent software processes the information in the torrent file and locates devices on the BitTorrent network sharing all or parts of the actual file(s) being sought. The download of the content referenced in the torrent is achieved after the requesting computer and the sharing computer(s) directly connect to each other through the Internet using the BitTorrent software.

7. The BitTorrent network bases all of its file shares on the Secure Hash Algorithm (SHA-1). The SHA-1 hash is the current Federal Information Processing and Digital Signature Algorithm. This mathematical algorithm allows for the digital fingerprinting of data. A torrent file is not the actual digital content but, instead, it defines the files to be shared as a series of contiguous pieces. The SHA-1 hash value for each “piece” of the torrent file is contained within the torrent file, as well as filenames, file sizes, and other data. Once you check a file or files with an SHA-1 hashing utility capable of generating this SHA-1 value (the fingerprint), that will be a fixed-length unique identifier for that file or files. The SHA-1 is secure because it is computationally infeasible for two files with different content to have the same SHA-1 hash

value.

8. Once a needed piece is downloaded via the BitTorrent network, the SHA-1 hash value of that piece is checked against the value within the torrent file. As soon as a piece is downloaded and verified, the software makes that piece available to upload to other peers who need and request it. This means that a user can share pieces of a file before they have the entire collection of files designated by the torrent file. Basically, a user can share the pieces they have if they don't have every piece identified by the torrent file.

9. One of the advantages of P2P file sharing is that multiple files may be downloaded at the same time. In addition, a user may download pieces of one file from more than one source computer at a time. For example, a BitTorrent user downloading a movie file may actually receive pieces of the movie from multiple computers. The advantage of this is that it speeds up the time it takes to download the file. It is possible to also download the file or files from only one computer.

10. A P2P file transfer is assisted by reference to an Internet Protocol ("IP") address. This address is unique to a particular computer during an online session. The IP address provides a unique location making it possible for data to be transferred between computers.

RELEVANT STATUTES

11. Based upon my training, experience, and discussions with federal prosecutors that I have worked with on this and other similar investigations, I have learned that:

a. 18 U.S.C. § 2252(a)(2) and (b)(1) prohibits any person from knowingly receiving or distributing, or attempting or conspiring to receive or distribute, any visual depiction using any means or facility of interstate or foreign commerce, or that has been mailed or shipped or transported in or affecting interstate or foreign commerce, or which contains materials which

have been mailed or so shipped or transported, by any means including by computer, or knowingly reproducing any visual depiction for distribution using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce or through the mails, if the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

DEFINITIONS

12. The following definitions apply to this Affidavit:

a. "Child pornography," as defined in 18 U.S.C. § 2256(8), is any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

b. "Internet Protocol address" or "IP address," as used herein, refers to a unique number used by a computer or other digital device to access the Internet. IP addresses can be "dynamic," meaning that the Internet service provider ("ISP") assigns a different unique number to a computer every time it accesses the Internet. IP addresses might also be "static" if an ISP assigns a user's computer a particular IP address that is used each time the computer accesses the Internet.

c. "Minor," as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.

d. "Sexually explicit conduct," as defined in 18 U.S.C. § 2256(2), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or

oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person.

e. "Visual depiction," as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

SUMMARY OF PROBABLE CAUSE

13. In or about July 2024, an FBI online covert employee (OCE) used a law enforcement tool to review a list of IP addresses that had been recorded recently sharing infohashes containing known or suspected child pornography on the BitTorrent P2P file sharing network. The infohashes were designated as (1) containing known or suspected child pornography based on observations by law enforcement personnel or (2) containing an identified victim of child pornography based on identification by the National Center for Missing and Exploited Children (NCMEC). The law enforcement tool indicated that IP address 108.48.121.68 (hereinafter "SUBJECT IP") was used to share infohashes containing known or suspected child pornography images and videos.

14. On or about July 13, 2024, the SUBJECT IP was connected to the BitTorrent P2P network and, using the law enforcement tool, the FBI OCE was able to connect directly to the SUBJECT IP and completely download several files depicting children engaged in sexually explicit conduct, including the following:

- a. The file identified as "[REDACTED]" is a video that lasts approximately 10 minutes and 25

seconds. The video shows a nude prepubescent female and an adult female. I believe the minor female in this video is prepubescent due to a lack of pubic hair, a lack of breast development, and her small body size relative to the adult in the video. At various times throughout the video, the adult female uses her hand to masturbate the prepubescent female's vagina. The adult female uses her hands to spread the prepubescent female's buttocks, thus exposing the prepubescent female's anus and vagina to the camera as the camera zooms in on the prepubescent female's genitalia. Finally, the adult female uses her mouth to perform oral sex on the prepubescent female's vagina. Additionally, this video has been confirmed by the National Center for Missing and Exploited Children (NCMEC) as depicting a real minor engaged in sexually explicit conduct.

b. The file identified as "[REDACTED]" is a video that lasts approximately two minutes and 19 seconds. The video shows a nude prepubescent female while an adult's hand masturbates the prepubescent female's vagina. The video then shows an adult male's penis as the adult male inserts his penis into the prepubescent female's vagina. I believe the minor female in this video is prepubescent due to a lack of pubic hair, a lack of breast development, and her small body size relative to the adult in the video.

15. On or about July 16, 2024, the SUBJECT IP was connected to the BitTorrent P2P network and, using the law enforcement tool, the FBI OCE was able to connect directly to the SUBJECT IP and completely or partially download several files depicting children engaged in sexually explicit conduct, including the following:

a. The file identified as "[REDACTED]" is a video that lasts approximately one minute and 32 seconds. The video shows a nude prepubescent female lying on her back with her vagina exposed to the camera. During the video, an adult male inserts an object into the prepubescent

female's vagina. I believe the minor female in this video is prepubescent due to a lack of pubic hair, a lack of breast development, and her small body size relative to the adult in the video.

16. On or about July 16, 2024, a member of the Child Exploitation and Human Trafficking Task Force (CEHTTF) served an administrative subpoena to Verizon for the SUBJECT IP. On or about July 22, 2024, Verizon provided responsive records, which indicated the SUBJECT IP was assigned to "Zhou Fang" at an address in McLean, Virginia. This address is within the Eastern District of Virginia.

17. On September 12, 2024, The Honorable Lindsey R. Vaala, United States Magistrate Judge in the Eastern District of Virginia, signed a warrant authorizing the search of Fang's residence in McLean, Virginia (1:24-SW-636). On September 17, 2024, the FBI executed that search warrant. Four devices were seized during the execution of the search warrant, to include one cell phone, one laptop computer, and two desktop computers.

18. Also on September 17, 2024, your affiant and another FBI Special Agent interviewed FANG. During the interview, FANG told investigators that the desktop computer found in the living room area (DEVICE 1) was his computer. Specifically, FANG said DEVICE 1 was password-protected, and his wife did not know the password. FANG also said that he had installed BitTorrent on DEVICE 1. Finally, while FANG was silent when asked if he child pornography on any of his electronic devices, when child pornography was found on DEVICE 1 during the search warrant, FANG stated that his wife did not know anything about such material being on DEVICE 1.

19. Following the execution of this search warrant, members of the FBI Washington Field Office Computer Analysis Response Team (CART) began a forensic exam of DEVICE 1. Members of the CEHTTF and CART reviewed a forensic image of DEVICE 1 and found a

BitTorrent log maintained on DEVICE 1.

20. According to the log, on or about September 1, 2024, DEVICE 1 “[a]dded new torrent. Torrent: “[REDACTED].””¹ In my training and experience, “added new torrent download finished” means the user has successfully downloaded the associated torrent file to the system.

21. A search of [REDACTED] in the forensic image of DEVICE 1 revealed a folder with the same name, [REDACTED].” A few examples of the images within the [REDACTED]” folder are described as follows:

a. A file entitled “[REDACTED]” is a video that lasts approximately 4 minutes and 13 seconds. The video begins by showing a nude prepubescent female lying on her stomach while an adult male, who is nude except for a pair of black socks, is on his knees, which are straddling the nude prepubescent female. Approximately 1 minute and 14 seconds into the video, the angle changes to a profile view of the adult male and minor female. At this point, the minor female is on her back, and the adult male is still on his knees, but now he is facing the minor female and holding her ankles in his hands. The adult male’s pubic area is pressed against the minor female’s pubic area, and it appears the adult male is penetrating the minor female’s vagina with his penis. I believe the minor female in the video is prepubescent based on the female’s small frame and lack of breast development.

b. A file entitled “[REDACTED]” is a video that lasts approximately 39 seconds. The video begins by showing a prepubescent female wearing a pink t-shirt lying on her back with her jean skirt pulled up above her pubic area. I believe the minor female is prepubescent due to her small frame, physical features, and lack of pubic hair. Throughout the video, an adult male is sitting in front of the minor female. The adult

¹ I know, based on my training and experience, that [REDACTED]” is a common abbreviation that represents a category of child sexual abuse material known as “[REDACTED]”

male is nude except for a green t-shirt. The adult male's legs are under the legs of the minor female. When the video begins, the adult male is using his hand to place his erect penis into the prepubescent female's vagina. Throughout the video, the adult male alternates between trying to force his erect penis into the prepubescent female's vagina and rubbing his erect penis on the minor female's vagina. This continues until the video ends.

22. Also according to the log found on DEVICE 1, on August 30, 2024, DEVICE 1 "[a]dded new torrent. Torrent: "[REDACTED]

[REDACTED] i." A search of [REDACTED] in the forensic image of DEVICE 1 revealed a video with the same name, which is described as follows:

23. This video lasts approximately 34 minutes and seven seconds. The video begins by showing a minor female sitting on a toilet while wearing a pink robe. The minor female appears to be looking at a device and occasionally leaning forward with her hands disappearing below the screen, which I believe indicates the minor female is typing. Based on these factors, the title of the video, and my training and experience, I believe this video shows a recording of a minor female using a computer webcam to communicate with someone, likely via the Internet, on a video chatting service. I believe the minor female in this video is prepubescent due to the female's lack of breast development, lack of pubic hair, and physical features. Approximately eight minutes and 51 seconds into the video, the minor female opens her robe, stands, and exposes her vagina directly to the camera. Approximately 10 minutes into the video, the minor female angles the camera toward her vagina and proceeds to raise her hips towards the camera, thus exposing more of her vagina. Throughout the remaining 24 minutes of the video, the minor female continues to expose her vagina to the camera by lifting her leg above her head, lifting her

hips toward the camera, and pointing the camera toward her vagina. At one point in the video, the minor female faces away from the camera and bends forward, thus exposing her anus directly to the camera. Approximately 31 minutes and 58 seconds into the video, the minor female directs the camera at her vagina and uses her hands to spread apart her labia, thus further exposing her vagina to the camera.

24. As of January 2, 2025, a further review of DEVICE 1 has revealed more than 105,700 images or videos that have been identified as child pornography, child exploitive material, or age questionable material. A few examples of the additional images or videos found on DEVICE 1 are described as follows:

a. The file entitled “[REDACTED]” is a video that lasts approximately 12 seconds. Throughout the video, an adult male places the end of his erect penis in the mouth of a crying baby. The gender of the baby cannot be determined because the video is focused on the baby’s face and the adult male’s erect penis is in the baby’s mouth. Also, the baby is too young for the baby’s facial features to reveal the baby’s gender. While the adult male’s erect penis is forced into the baby’s mouth, the adult male uses his hand to masturbate his penis. Approximately six seconds into the video, the adult male ejaculates on the baby’s face. After ejaculating on the baby’s face, the adult male places his erect penis back into the baby’s mouth. All of this occurs while the baby is crying.

b. The file entitled “[REDACTED]” is a compilation video that lasts approximately one minute and 20 seconds. The first approximately nine seconds of the video show an adult male placing his erect penis in the mouth of a baby. The next approximately 15 seconds show an adult male using his hand to masturbate his penis while standing over an infant female who is lying on her back. The adult male uses his other hand to hold the leg of the baby girl. The adult male

continues to masturbate until he ejaculates onto the infant female. The next approximately 41 seconds shows an adult male standing over an infant female on a bed. Initially the infant female is on her knees with her buttocks in the air. The infant female's diaper is pulled down and to the side while it is still wrapped around her right leg. An adult male is kneeling on the bed behind the infant female while rubbing his erect penis on the infant female's pubic area. At least once it appears the adult male attempts to penetrate the infant female with his erect penis, but the small size of the baby makes it difficult to determine if the adult male was trying to penetrate the baby's vagina or anus. The infant's small size also makes it difficult to determine if the adult male successfully penetrated her. Around the 46 second mark of the video, the infant female is shown lying on her back while the adult male uses one hand to hold the infant female in place while he uses the other hand to masturbate his erect penis. He continues to do this until he ejaculates onto the infant female. The last 15 seconds of this compilation shows an adult male standing over an infant female, who is lying on her back. The adult male uses his hand to masturbate the infant female's vagina. The adult male then ejaculates onto the infant female. It appears that the adult male and infant female may be the same people in each of these videos.

c. The file entitled [REDACTED] is a video that lasts approximately 29 seconds. Throughout the video, an adult has his erect penis in the mouth of a minor female.

25. During the review of DEVICE 1, investigators found evidence that substantiated FANG's interview statement that he was the sole owner and operator of DEVICE 1. For example, several pictures of FANG and individuals who appear to be friends or family members were stored on DEVICE 1. Further, personal documents including FANG's wife's tax information were also located on DEVICE 1. Finally, the user account/login name for DEVICE 1

is “zf7s.” Open-source Google checks confirm that FANG has used the email address zf7s [REDACTED]; FANG attended the University of Virginia.

26. Also on September 17, 2024, during the execution of the search warrant at FANG’s residence, your affiant and another FBI agent interviewed FANG’s wife (identified herein as “C.P.”). During the interview, C.P. told investigators that DEVICE 1 belonged to FANG and that she was unable to log into DEVICE 1.

CONCLUSION

27. For the reasons set forth below, I submit that probable cause exists to believe that between on or about at least on or about August 14, 2024, and on or about September 17, 2024, while residing in the Eastern District of Virginia, FANG knowingly received and attempted to receive material involving the sexual exploitation of minors via an internet-based peer to peer program operating on the BitTorrent file sharing system. I respectfully request that a criminal complaint be issued for FANG.

Respectfully submitted,

Matthew Lee

Matthew Lee, Special Agent
Federal Bureau of Investigation

Respectfully submitted and attested to in accordance with the requirements of Fed. R. Crim. P. 41 via telephone on January 10th, 2025.

Lindsey R Vaala

Digitally signed by Lindsey R Vaala
Date: 2025.01.10 15:17:13 -05'00'

The Honorable Lindsey R. Vaala
United States Magistrate Judge